

SHER TREMONTE LLP

October 16, 2020

Application granted. Sentencing adjourned
to December 17, 2020 at 2:30 p.m.

VIA ECF

The Honorable William H. Pauley, III
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

October 19, 2020

Re: *United States v. Thomas Irigoyen*
Case No. 19-CR-226 (WHP)

Dear Judge Pauley:

We write on behalf of our client, Thomas Irigoyen, to respectfully request that sentencing, currently scheduled for November 5, 2020, be adjourned until such time as Mr. Irigoyen is able to safely travel to attend the proceeding in person. Mr. Irigoyen's health issues, in particular his obesity and heart condition, make him especially vulnerable to severe complications from COVID-19. An in-person sentencing at this time would require Mr. Irigoyen to travel to New York from California, which would likely increase his exposure to infection. Although it is currently not possible to predict with certainty when that will happen, at this time we request that the Court adjourn the sentencing date for 30 days. We have spoken to Assistant U.S. Attorney Dan Wolf and he consents to the proposed adjournment. We appreciate the Court's consideration.

Respectfully submitted,

/s/ _____
Michael Tremonte
Noam Biale

Attorney for Thomas Irigoyen

cc: All counsel (via ECF)